

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

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INITIALS STW

Background Facility Information

Facility Name: Stanley Tools

EPA Identification No.: MID 1099124299

Location (City, State): Fowlerville, MI

Facility Priority Rank: High

ENFORCEMENT
CONFIDENTIAL

W/permission
from
Tom Williams
and
Juan Thomas

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Several SWMUs - units F, G, H, I all could be potential candidates for interim measures/stabilization.

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?
- ☐ No corrective action activities initiated (Go to 5)
 - ☐ RCRA Facility Assessment (RFA) or equivalent completed
 - ☒ RCRA Facility Investigation (RFI) underway
 - ☐ RFI completed
 - ☐ Corrective Measures Study (CMS) completed
 - ☐ Corrective Measures Implementation (CMI) begun or completed
 - ☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit
- ☐ Post-closure permit
- ☒ Enforcement order
- ☐ Other (Explain)

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes
- ☐ No
- ☒ Uncertain; still underway
- ☐ Not required

Additional explanatory notes:

N/A

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

☒ Ground water
☐ Surface water
☐ Air
☒ Soils

6. Are contaminant releases migrating off-site?

☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

☐ No
☒ Uncertain

- 7a. Are humans currently being exposed to contaminants released from the facility?

☐ Yes (Go to 8a)
☐ No
☒ Uncertain

Additional explanatory notes:

Trespassers could come in contact with contaminants.
It does not appear any groundwater users are impacted, although the extent of the contaminant plume is not known at this time.

- 7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

- 8a. Are environmental receptors currently being exposed to contaminants released from the facility?

☐ Yes (Go to 9)
☐ No
☒ Uncertain

Additional explanatory notes:

The Red Cedar River is adjacent to the facility and could be impacted by site contaminants. This possibility will be investigated further.

- 8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

The groundwater plume may travel far enough to directly impact human or environmental receptors.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

- ☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

Interim measures, if implemented during CMS/CMI tasks, could remove contaminated surface soils and eliminate or mitigate risks from human contact.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

- ☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

Corrective measures could be implemented at units F, G, H, I in the short-term, but it is not certain if interim measures would result in significant decreases of site risks, since the risk assessment has not been completed.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

- ☒ Solid
☒ Light non-aqueous phase liquids (LNAPLs)
☐ Dense non-aqueous phase liquids (DNAPLs)
☒ Dissolved in ground water or surface water
☐ Gaseous
☐ Other _____

13. Which of the following major chemical groupings are of concern at the facility?

- ☒ Volatile organic compounds (VOCs) and/or semi-volatiles
☐ Polynuclear aromatics (PAHs)
☒ Pesticides
☐ Polychlorinated biphenyls (PCBs) and/or dioxins
☐ Other organics
☒ Inorganics and metals
☐ Explosives
☐ Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

- ☒ Yes; Indicate possible course of action.

excavation and off-site disposal
groundwater extraction and treatment

- ☐ No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

- ☒ Yes
☐ No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

- ☐ Yes
☐ No

**Timing and Other Procedural Issues
Associated with Stabilization**

16. Can stabilization activities be implemented more quickly than the final corrective measures?

- ☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

Interim measures for units F, G, H, I could
probably be completed prior to completion
of the CMS/CMS for the rest of the
facility.

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

- ☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- ☒ Yes
- ☐ No, not feasible
- ☐ No, not required

Explain final decision, using additional sheets if necessary.

I would recommend this facility be considered a candidate for interim measures. Due to potential for human exposure via direct contact, and the fact that no technological limitations exist, units F, G, H, I are amenable to a "fast-track" approach.

